

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 1:05CR407
	)	
CRAIG J. OLIVER,	)	Count 1: 18 U.S.C. § 1343
	)	(Wire Fraud)
Defendant.	)	

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

I. Introduction

1. Dominion Building and Construction Corp. (hereinafter “Dominion”) and Potomac Building Corp. (hereinafter “Potomac”) were incorporated in Virginia on August 27, 2002. Dominion and Potomac both maintained a business address at 5124 Heritage Lane, Alexandria, Virginia 22311, the residence of Craig J. Oliver (hereinafter “Oliver”), in the Eastern District of Virginia. Dominion and Potomac were managed and run by Craig J. Oliver.

2. Craig J. Oliver also managed, owned and did business as Dominion Building and Construction of VA, Dominion Building and Construction Company of Virginia, Inc., Dominion Building and Construction Company, Dominion Building and Construction Companies, and Thomas and Thomas Construction Company Incorporated.

3. Dominion Building and Construction Corp. as well as the other companies owned and managed by defendant, were home renovation businesses which marketed, designed and constructed additions and renovations of homes in Virginia and Maryland.

## II. The Scheme and Its Objects

4. From in or about August 2002, until in or about February 2005, Oliver devised and intended to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises.

5. The object of the scheme was to permit Oliver to obtain and use funds to which he was not otherwise entitled.

## III. Manner and Means of the Scheme

6. It was part of the scheme and artifice to defraud that Oliver marketed and induced homeowners to enter into home improvement contracts with Dominion Building and Construction Corp., and other companies, by making false, fraudulent and misleading representations.

7. It was further part of the scheme and artifice to defraud that Oliver obtained money from homeowners by falsely and fraudulently representing, among other things, that:

(a) Oliver possessed a contractor's business license which authorized him to build construction projects in Virginia.

(b) Oliver had a partner who maintained a contractor's business license in Virginia.

(c) Dominion Building and Construction Corp. was licensed to do business in Maryland.

(d) Dominion Building and Construction Corp. was an experienced fourth generation construction business.

(e) The home improvement projects would be completed in ninety days.

(f) Subcontractors had been paid for work on the homeowners projects.

(g) As of October 27, 2004, his companies had been ordered by the owners, directors and officers to cease and desist all operations and that he was resigning as an employee of Dominion.

(h) After October 27, 2004, Dominion Building and Construction was properly licensed and in business.

8. Additionally, to further the scheme, Oliver forged and submitted documents to mislead and make false representations to government licensing agencies as well as to homeowners and subcontractors. Specifically:

(a) Oliver forged the signature of a person, known to the United States Attorney, on an application for a Class A contractor's license and submitted the application to the Department of Professional and Occupational Regulation, Commonwealth of Virginia.

(b) Oliver submitted false income and business information to obtain office space for Dominion Building and Construction Corp.

(c) Oliver represented and showed photographs to homeowners which falsely purported to be completed projects of Dominion Building and Construction to induce homeowners to enter into contracts and make contract payments.

9. It was further part of the scheme and artifice to defraud that Oliver also obtained copies of the construction licenses of three Maryland home improvement companies under false pretenses and used the licenses to falsely induce homeowners in Maryland to sign home renovation contracts with Dominion Building and Construction Corp.

10. It was further part of the scheme and artifice to defraud that Oliver forged the signature of the owner of Roberts Home Improvement on a letter to the Virginia Board of Contractors falsely representing that the business entity known as Roberts Home Improvement had changed its name and address to Dominion Building and Construction Corp.

11. It was further part of the scheme and artifice to defraud that Oliver structured the contract payments from the homeowners, which were induced by false promises and misrepresentations, to ensure that Dominion Building and Construction would receive eighty percent of the agreed contract price in the first few weeks of a project. Oliver diverted the money received by the homeowners to his own use and had no intention of completing the projects. Oliver continued to use false promises and representations to induce homeowners to make additional payments for work or material which he did not intend to complete. Oliver produced incomplete and substandard construction work to induce homeowners to make further contract payments.

12. It was further part of the scheme and artifice to defraud that Oliver used email, telephone, United States mail, and facsimile transmissions, all effecting interstate commerce, to conduct business and perform the daily business activities.

13. It was further part of the scheme and artifice to defraud that Oliver entered into contracts with homeowners in Virginia and Maryland worth more than 5.9 million dollars. Oliver collected in excess of four million dollars in contract payments.

#### IV. Use of the Interstate Wire System

14. On or about the listed date, within the Eastern District of Virginia and elsewhere, for the purpose of executing the above-described scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, Oliver knowingly caused to be transmitted by means of wire, radio and television communication in interstate commerce, certain writings, signs, signals, pictures and sounds as set forth in detail below:

<u>Count</u>	<u>Date</u>	<u>To/From</u>	<u>Description</u>
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(In violation of Title 18, United States Code, Section 1343.)

Paul J. McNulty  
United States Attorney

By: \_\_\_\_\_  
Robert C. Erickson  
Assistant United States Attorney